

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTOPHER SPEAKES, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

TARO PHARMACEUTICAL INDUSTRIES, LTD.,
MICHAEL KALB, AND KALYANASUNDARAM
SUBRAMANIAN,

Defendants

Case No.: 16-cv-08318-ALC-OTW

Hon. Andrew L. Carter Jr., U.S.D.J.

Hon. Ona T. Wang, U.S.M.J.

**DECLARATION OF MICHAEL S. BIGIN IN SUPPORT
OF LEAD PLAINTIFF'S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT
AND AUTHORIZATION TO PROVIDE NOTICE TO THE CLASS**

I, MICHAEL S. BIGIN, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at the law firm Bernstein Liebhard LLP, the Court-appointed Lead Counsel in this class action and am admitted to practice before this Court. I respectfully submit this declaration in support of Lead Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement and Authorization to Provide Notice to the Class.

2. True and correct copies of the following documents are annexed hereto:

Exhibit 1: Stipulation and Agreement of Settlement, dated as of April 10, 2024, with exhibits thereto.

Exhibit 2: Laarni T. Bulan and Laura E. Simmons, Securities Class Action Settlements – 2022 Review and Analysis (Cornerstone Research 2023).

Exhibit 3: *Fleming v. Impax Labs Inc.*, No. 4:16-cv-06557-HSG (N.D. Cal. July 30, 2021).

Exhibit 4: *In re Allergan Generic Drug Pricing Sec. Litig.*, No. 2:16-cv-09449 (KSH) (CLW) (D.N.J. July 9, 2021).

Exhibit 5: *In re Teva Sec. Litig.*, No. 3:17-cv-00558 (SRU) (D. Conn. Apr. 28, 2022).

Exhibit 6: *In re Sundial Growers Inc. Sec. Litig.*, No. 1:19-cv-08913-ALC (S.D.N.Y. Oct. 6, 2022).

Exhibit 7: *In re Livent Corp. Sec. Litig.*, Case No. 190501229 (Pa. Com. Pl.) (Notice of Pendency of Class Action, Proposed Settlement, and Motion for Attorneys' Fees and Expenses).

Exhibit 8: *In re Broadcom Corp. Sec. Litig.*, No. 01-CV-00275-MLR (C.D. Cal. Aug. 1, 2012).

Exhibit 9: *In re Ubiquiti Networks, Inc. Sec. Litig.*, No. 12-cv-04677-YGR (N.D. Cal.) (Notice of Pendency of Class Action, Proposed Settlement, and Motion for Attorneys' Fees and Expenses).

Exhibit 10: *In re Genworth Fin., Inc. Sec. Litig.*, No. 1:14-cv-02392-AKH (S.D.N.Y. Nov. 16, 2017).

Exhibit 11: Bernstein Liebhard LLP Firm Biography.

Exhibit 12: Firm Biography of JND Legal Administration, the proposed claims administrator for the Settlement.

I declare under penalty of perjury under that the foregoing is true and correct.

Dated: April 15, 2024

/s/ Michael S. Bigin
MICHAEL S. BIGIN